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 Police Department, Jacob Adams and Miguel Jahuey

8 **UNITED STATES DISTRICT COURT**9 **DISTRICT OF NEVADA**

10 Fernando Garcia,  
 11 Plaintiff,

12 vs.

13 Corner Investment Company, LLC d/b/a The  
 14 Cromwell Las Vegas, Jacob Adams, Miguel  
 15 Jahuey, the Las Vegas Metropolitan Police  
 16 Department, a municipality, and Does I-XX,

Defendants.

Case Number:  
2:22-cv-01960-MMD-VCF

**STIPULATION AND ORDER TO  
 EXTEND PLAINTIFF'S AND LVMPD  
 DEFENDANTS' REONSES TO  
 MOTION FOR SUMMARY  
 JUDGMENT DEADLINE**

**(FIRST REQUEST)**

17 The Parties, Plaintiff Fernando Garcia (“Plaintiff”), by and through their attorneys of  
 18 record, Robert A. Nersesian, Esq. and Thea Marie Sankiewicz, Esq., with the law firm of  
 19 Nersesian & Sankiewicz and Defendants, Las Vegas Metropolitan Police Department  
 20 (“LVMPD”), Officer Jacob Adams (“Adams”) and Officer Miguel Jahuey (“Jahuey”)  
 21 (collectively “LVMPD Defendants”), by and through their attorneys of record, Craig R.  
 22 Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach, and  
 23 hereby agree and jointly stipulate the following:

24 1. This request for an extension of time is not sought for an improper purpose or  
 25 other purpose of delay. Due to the holidays and schedules of counsel, the Parties are  
 26 seeking an extension of the response deadlines to competing motions for summary  
 27 judgment. This is the first request for extension of time in this matter. The parties  
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1 respectfully submit that the reasons set forth above constitute compelling reasons for the  
2 modest extension.

3       2. The Parties further agree, LVMPD Defendants' Response to Plaintiff's  
4 Motion for Partial Summary Judgment Establishing Liability [ECF No. 55] deadline  
5 currently set for December 13, 2023 shall be extended to Wednesday, December 27, 2023.

6       3. The Parties further agree, Plaintiff's Opposition to LVMPD Defendants'  
7 Motion for Summary Judgment [ECF No. 57] deadline currently set for December 18, 2023  
8 shall be extended to Tuesday, January 2, 2024.

9       4. WHEREFORE, the parties respectfully request that LVMPD Defendants'  
10 Opposition to Plaintiff's Motion for Partial Summary Judgment Establishing Liability [ECF  
11 No. 55] be extended to and including Wednesday, December 27, 2023 and Plaintiff's  
12 Opposition to LVMPD Defendants' Motion for Summary Judgment [ECF No. 57] be  
13 extended to and including Tuesday, January 2, 2024.

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I electronically filed the foregoing **STIPULATION AND**  
3 **ORDER TO EXTEND PLAINTIFF'S AND LVMPD DEFENDANTS' REONSES TO**  
4 **MOTION FOR SUMMARY JUDGMENT DEADLINE (FIRST REQUEST)** with the  
5 Clerk of the Court for the United States District Court by using the court's CM/ECF system  
6 on the 12th day of December, 2023.

7  I further certify that all participants in the case are registered CM/ECF users  
8 and that service will be accomplished by the CM/ECF system.

9  I further certify that some of the participants in the case are not registered  
10 CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid,  
11 or have dispatched it to a third party commercial carrier for delivery within 3 calendar days  
12 to the following non-CM/ECF participants:

13 N/A

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15 /s/ Krista Busch  
16 An employee of Marquis Aurbach

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